

Donald A. Nunn, Esq. SBN 54232
13426 Community Road
Poway, CA 92064
Telephone: (858)748-8612
Facsimile: (858)748-8610

Attorney for Defendant, Beatrice Arana

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 07CR2916-JAH
)	
Plaintiff,)	NOTICE OF MOTION AND
)	MOTION TO:
vs.)	
)	1) COMPEL FURTHER DISCOVERY; AND
RAMON MACIAS-COLMENARES (1),)	2) LEAVE TO FILE FURTHER MOTIONS
DEBRA MIKA (2),)	
BEATRICE ARANA (3).)	DATE: November 19, 2007
)	TIME: 8:30 a.m.
Defendants.)	
)	

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY :

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **November 19, 2007 at 8:30 a.m.** or as soon thereafter as Counsel may be heard, the Defendant, Beatrice Arana, by and through her counsel, Donald A. Nunn, will ask this Court to enter an order granting the motions listed below.

///

///

MOTION

Beatrice Arana, the Defendant in this case, by and through her attorney, Donald A. Nunn, pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- 1) Compel Discovery; and
- 2) Leave to file further motions.

This motion is based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, and any and all other matters that may come to this Court's attention prior to or at the time of the hearing on this motion.

Date: October 31, 2007

Respectfully submitted,

s/Donald A. Nunn
Donald A. Nunn,
Attorney for Defendant Beatrice Arana

CERTIFICATE OF SERVICE

I, Donald A. Nunn declare that:

I am, and was at the time of service of the papers herein referred to, over the age of 18 years and not a party to this action; and I am employed in the County of San Diego, California. My business address is 13426 Community Road. Poway, California.

I caused to be served by electronic mail on October 31, 2007

NOTICE OF MOTION AND MOTION TO COMPEL FURTHER
DISCOVERY AND FOR LEAVE TO FILE FURTHER MOTIONS

to the following:

- **Frederick Matthew Carroll**
frederickcarroll@hotmail.com,bratty_77@yahoo.com
- **Scott Pactor**
scottpactor@yahoo.com
- **U S Attorney CR**
Efile.dkt.gc2@usdoj.gov

s/Donald A. Nunn

Donald A. Nunn,
Attorney for Defendant Beatrice Arana